
**UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

ENVIRONMENTAL HEALTH TRUST, et al.,
CHILDREN'S HEALTH DEFENSE, et al.,
Petitioners,

v.

FEDERAL COMMUNICATIONS COMMISSION,
UNITED STATES OF AMERICA,
Respondents.

PETITION FOR REVIEW OF FINAL ORDER OF THE
FEDERAL COMMUNICATIONS COMMISSION

**MOTION OF BUILDING BIOLOGY INSTITUTE
TO PARTICIPATE AS AMICUS CURIAE**

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MOTION TO PARTICIPATE AS AMICUS CURIAE

This Motion is made pursuant to Rule 29(a)(3)(A) and (B). Movant Building Biology Institute (BBI) has a long-standing commitment to ensuring the FCC's careful consideration of existing scientific evidence relating to Radio Frequency Radiation (RFR) harms on humans and other biological systems. Indeed, the President of BBI's Board of Directors, Lawrence James Gust, expressed his deep concerns about the FCC's flawed policies as early as seven years ago in a Comment to ET Docket No. 03-137 and ET Docket No. 13-84. These same concerns appear not to have been addressed and are now once again before the Court.

Based on its practical experience and that of its certified practitioners, Movant BBI can provide unique insights for the Court into the actual suffering of victims of RFR contamination, the economic costs of protecting their homes and families, and from a legal perspective, the close nexus between measurable RFR exposure and effective remediation.

Movant respectfully requests the Court to grant this Motion and to allow filing of the Building Biology Institute Amicus Brief.

Respectfully submitted,

/s/ James S. Turner

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August 5, 2020

CERTIFICATE OF SERVICE

I hereby certify that on this 5th day of August, 2020, I electronically filed the foregoing Motion to Participate as Amicus Curiae on behalf of Building Biology Institute with the Clerk of the Court for the United States Court of Appeals for the District of Columbia by using the Court's CM/ECF system. I further certify that service was accomplished on all participants in the case via the Court's CM/ECF system.

/s/ James S. Turner

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